

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

Tracee A. Beecroft, on behalf of herself
and all others similarly situated,

Plaintiff,

v.

ALTISOURCE BUSINESS SOLUTIONS
PVT. LTD.,

Defendant.

Case No. 0:15-cv-02184-SRN-BRT

PLAINTIFF'S MOTION FOR ATTORNEYS' FEES AND SERVICE AWARD

Pursuant to the Court's Order (ECF No. 273) and the proposed settlement agreement in this case, Plaintiff Tracee A. Beecroft, by and through counsel, respectfully moves the Court for an Order awarding Class Counsel attorneys' fees in the amount of \$600,000, or one-third of the \$1,800,000 common fund obtained for the benefit of the Settlement Class in the proposed settlement of this action, plus costs of \$26,362.67.

Plaintiff also requests that the Court approve an incentive award to Plaintiff Tracee A. Beecroft as Class Representative, in the amount of \$15,000.

In support of this Motion, Plaintiff relies upon the accompanying memorandum of law, declarations of counsel, and all the files, records, and proceedings herein.

Dated: December 14, 2017

Respectfully submitted,

TRACEE A. BEECROFT, on behalf of
herself and others similarly situated

By: /s/ Mark L. Heaney
Mark L. Heaney (No. 0333219)
HEANEY LAW FIRM, LLC
601 Carlson Parkway, Suite 1050
Minnetonka, MN 55305
Telephone: (952) 933-9655
Facsimile: (952) 487-0189
mark@heaneylaw.com

Alexander H. Burke (*pro hac vice*)
BURKE LAW OFFICES, LLC
155 N. Michigan Ave., Suite 9020
Chicago, IL 60601
Telephone: (312) 729-5288
Facsimile: (312) 729-5289
aburke@burkelawllc.com

*Counsel for Plaintiff and the
Settlement Class*